

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION (CLEVELAND)**

**FILED**  
**MAR 03 2025**  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

Jeffery Harris,  
individually and on  
behalf of all others  
similarly situated,  
**Plaintiff,**

**1:25 CV 00414**  
**JUDGE BARKER**  
**MAG. JUDGE GREENBERG**

Case:..

v.  
ExxonMobil Corporation,  
Chevron Corporation,  
BP America Inc.,  
**Defendant..**

**CLASS ACTION COMPLAINT  
JURY TRIAL DEMANDED**

**INTRODUCTION**

1. I'm Jeffery Harris, Marine vet, paralegal, no stranger to federal court—I settled a free speech suit pro se in Alabama's Southern District, pushing for a class but taking cash instead. Now, I'm after ExxonMobil, Chevron, BP. From 1980 to 1998, Cleveland's 114th St. Clair drowned me in leaded gas fumes— Godawful choking exhaust that made me "Shifty" . . It's very sad as we were given bus tickets to ride the RTA bus that would always connect at terminal tower bus depot I literally could not breathe I felt something was wrong then, we were being gassed, as a result I was failing six classes a year. I Served in the

Marine Corps '99 to '05, broke with anxiety, depression, bipolar, PTSD—VA-stamped. Two spinal surgeries later, I'm on HUD-VASH, raising five kids off my wife's pay. Duke's study (Dec 2024) says 151 million of us carry lead's scars—Gen X hit worst. They knew since the '20s, sold it anyway. I'm filing to start this, for cash justice, then handing it to pros.

### **JURISDICTION AND VENUE**

2. Fits 28 U.S.C. § 1332(d)—damages over \$5 million, I'm Alabama, they're Texas, Delaware, elsewhere. Clean Air Act '96 ban ties it federal.
3. Cleveland's my battleground—Northern District of Ohio.

### **PARTIES**

4. Jeffery Harris, 1954 North Maryvale, Mobile, AL 36605—exposed in Cleveland (44108), '80–'98.
5. Defendants ExxonMobil (Texas), Chevron (California), BP America (Delaware)—leaded gas titans.

### **FACTS**

6. Leaded gas ran '23–'96, peaking when I breathed it at 114th St. Duke says 10-15 ng/dL blood levels there—way over safe. Their 151M case count pegs me—Gen X, born '80, stuck in it.
7. School was hell—six high schools, six F yearly. Teacher nicknamed me, "Shifty" due to my constant looking around and twitching, started self medicating young. Marines—Okinawa, Quantico—ended in a BCD I'm fighting, mental roots deep. VA caught it '03, now a slew of disorders. Post-ACDF surgeries, HUD-VASH keeps us housed.
8. These oil giants knew—'20s warnings, '60s proof—kept selling poison.

### **CLASS ALLEGATIONS**

9. Class: "All U.S. residents exposed to leaded gasoline, 1920–1996, with mental health or cognitive harm—like anxiety, depression, bipolar, PTSD, learning deficits."
10. Numerosity: 151M, per Duke—too many for solo.

- 11. Commonality: Did their lead break us? Did they know?
- 12. Typicality: My Cleveland wreckage fits—Duke's Gen X data.
- 13. Adequacy: I've settled pro se in federal court—I'm good to start. If certified, I ask Rule 23(g) counsel to take it, given my limits.

### **CLAIMS**

- 14. Negligence: Knew lead was toxic, sold it.
- 15. Public Nuisance: Poisoned air, minds.
- 16. Product Liability: Defective gas, no warning.

### **RELIEF**

- 17. No job, post-surgery, HUD-VASH, wife's pay for five kids—two on SSI. Class lost billions. Cash for bills, pain, a fund for mental health, punitive damages—make it right.

### **JURY DEMAND**

- 18. Jury—I've got a fight to tell.

Dated: February 24, 2025

Jeffery Harris, Pro Se

1954 North Maryvale

Mobile, AL 36605

228-819-0118

A handwritten signature in black ink, appearing to read "Harris" followed by a stylized flourish.

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Jeffery Harris,  
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v.

ExxonMobil Corporation,  
Chevron Corporation,  
BP America Inc.,

**Defendants.**

Case No.:

**MOTION TO CERTIFY CLASS**

1. I'm Jeffery Harris, vet, paralegal—I settled pro se in Alabama's Southern District, pushing class status. Now, I ask to certify this leaded gas class. Cleveland's 114th St., '80-'98, made me "Shifty"—failing school, breaking in the Marines, now post-surgery with disorders Duke ties to 151M cases.

2. Class: "All U.S. residents exposed to leaded gasoline, 1920–1996, with mental health or cognitive harm from lead."

3. Rule 23(a):

- Numerosity: 151M—unmanageable solo.

- Commonality: Did defendants' lead cause this? Were they negligent?
  - Typicality: My Gen X scars fit Duke's data.
  - Adequacy: I've won pro se before—I'm solid to start. Post-certification, I request Rule 23(g) counsel to lead.
4. Rule 23(b)(3): Common issues rule; one suit beats millions. Certify us.

Dated: February 24, 2025

Jeffery Harris, Pro Se

A handwritten signature in black ink, appearing to read "H. J. Harris", written in a cursive style.

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